

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

Walter J. Fleischer, Jr.
Heather M. Hughes
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Attorneys for Plaintiff
LEAP Systems, Inc.

LEAP SYSTEMS, INC.,)	DOCUMENT
Plaintiff,)	ELECTRONICALLY FILED
v.)	Civil Action No. 05cv1521(FLW)
)	Hon. Freda L. Wolfson
MONEYTRAX, INC., ESTATE OF)	NOTICE OF MOTION TO
NORMAN BAKER and PEGGY)	SEAL MATERIALS
BAKER,)	PURSUANT TO L. CIV. R. 5.3
Defendants.)	
)	
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)	
)	

TO: All Counsel of Record

PLEASE TAKE NOTICE that on July 20, 2009 at 10:00 a.m., or as soon as counsel may be heard, Plaintiff LEAP Systems, Inc., ("LEAP"), shall apply before the Honorable Freda L. Wolfson, United States District Judge, at the Clarkson S. Fisher Federal Building and U.S. Courthouse, 402 East State Street, Trenton, New Jersey, for an Order, pursuant to L. Civ. R. 5.3, sealing those

portions of non-party Todd Langford's Motion to Intervene and Modify or Vacate the Court's May 9, 2008 Order sealing a recording made on March 25, 2008, discussing the specific terms of the settlement agreement between LEAP Systems, Inc. and MoneyTrax, Inc. LEAP will also seek to seal portions of LEAP's opposition to Mr. Langford's motion, and any reply thereto.

PLEASE TAKE FURTHER NOTICE that in support of this application, LEAP will rely upon the accompanying Declaration of Matthew C. Moench. A form of Order is also submitted herewith.

PLEASE TAKE FURTHER NOTICE that if opposition is presented, LEAP requests oral argument.

Respectfully Submitted,

DRINKER BIDDLE & REATH LLP



Matthew C. Moench
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Attorneys for Plaintiff,
LEAP Systems, Inc.

Dated: June 24, 2009